UNITED STATES DISTRICT COLUMN TILL	
DISTRICT OF PUERTO RICO PH 3: 0	ı
U.S. DISTRICT COURT SAN JUAN, P.R.	
)	
United States of America	
v.) No. 3:98CR127-01 (SEC)	
Puerto Rico Electric Power Authority)))	

Motion of Attorney John C. Ryan to Withdraw as Counsel for Defendant The Puerto Rico Electric Power Authority

COMES NOW attorney John C. Ryan, attorney for defendant Puerto Rico Electric Power Authority ("PREPA"), and moves this Honorable Court for leave to withdraw as counsel for the defendant, and in support thereof avers as follows:

- 1. John C. Ryan, along with Lawrence W. Diamond, Melissa H. Maxman, and Marco A. Gonzalez, Jr., Equires, currently is an attorney of record for the defendant in this action.
 - 2. John C. Ryan is appearing in this action on a *pro hac vice* basis.
- 3. Effective February 11, 2005, John C. Ryan will withdraw from the Duane Morris LLP partnership to take a position with a corporation.
- 4. The other attorneys from Duane Morris LLP will continue to represent defendant in this action.
- 5. The Local Rule 83.4 of the United States District Court for the District of Puerto Rico permits the withdrawal of counsel only by leave of Court.

WHEREFORE, attorney John C. Ryan respectfully requests that this Honorable Court enter an Order, in the form attached hereto, permitting John C. Ryan to withdraw as counsel for Defendant The Puerto Rico Electric Power Authority.

In Philadelphia, Pennsylvania, this 31st day of January 2005.

RESPECTFULLY SUBMITTED,

DUANT MORRIS LLP Melissa H. Maxman. John C. Ryan One Liberty Place Philadelphia, PA 19103

(215) 979-1159

Counsel for Defendant Puerto Rico Electric Power Authority

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 31st day of January, 2005, a true and correct copy of the foregoing Motion to Withdraw as Counsel was served via first class mail, postage prepaid, to counsel for the United States of America, addressed as follows:

Howard P. Stewart, Esquire Senior Litigation Counsel Environmental Crimes Section United States Department of Justice PO Box 23985 Washington, DC 20026-3985

A courtesy copy for informational purposes was also forwarded via first class mail to:

Mr. Victor M. Canino, III
U.S. Probation Officer
United States District Court
District of Puerto Rico
U.S. Probation Office
143 Federal Building
150 Chardón Avenue
San Juan, PR 00918-1741

Sylvia Carreño-Coll, Esquire
EPA Region 2, Caribbean Environmental Protection Division
Centro Europa Building, Suite 417
1492 Ponce de Leon Avenue
San Juan, Puerto Rico 00907-4127

John C. Ryan